IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,	§ §
Plaintiffs,	§ §
v.	§ § • • • • • • • • • • • • • • • • • •
Broadcom Inc. Brocade Communications Systems LLC Extreme Networks, Inc.	§ Jury Trial Demanded § § §
Defendants.	§

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Come now Plaintiffs SNMP Research, Inc. and SNMP Research International, Inc. (collectively "Plaintiffs"), by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court's Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], seek leave of this Court to submit certain documents under seal and/or in redacted form as indicated below.

Plaintiffs move for leave to file the following items relating to Plaintiffs' Evidentiary Supplement Pursuant to Docket 147 ("Plaintiffs' Supplement") under seal, each of which contains text that either the Defendants, Broadcom Inc. and/or Brocade Communications Systems, Inc. ("Defendants") or Plaintiffs have designated confidential, highly confidential, or attorney's eyes only:

1. The Declaration of Olivia Weber in Support of Plaintiffs' Supplement ("Weber Declaration") and Exhibits 1, 22, 37, 43-49, 51, 52, 54-56, 62, 64-67, 74, 75, 79, 82, and 84 to the Weber Declaration because Defendants have designated these items as confidential, highly confidential, or outside counsel eyes only.

- 2. Exhibits 200 through 221 to the Weber Declaration, which consist of Excel spreadsheets produced by the Defendants that have been filed manually due to their format and size and were designated by the Defendants as outside counsel's eyes only.
- 3. The Declaration of Michael J. Wallace ("Wallace Declaration") and Exhibits 2 and 3 to the Wallace Declaration. The Wallace Declaration contains information that Defendants have designated as confidential, highly confidential or outside counsel eyes only. Exhibits 2 and 3 are materials Defendants have designated as outside counsel eyes only.
- 4. Exhibit A to the Declaration of Dr. Jeffrey D. Case, which is a document that Defendants have designated as confidential.
- 5. Exhibit C to the Declaration of Dr. Jeffrey D. Case, which is a document that Plaintiffs have designated as confidential because it contains Plaintiff's commercially sensitive, confidential licensing terms and pricing term. *See Moore v. Westgate Resorts*, Ltd., 2020 WL 7017738, at *1-3 (E.D. Tenn. May 22, 2020).

Where items specified above are being filed under seal because they contain information obtained from or are documents Defendants have marked confidential, highly confidential or attorney's eyes only, Plaintiffs present this Motion to the Court without a position on whether the documents should be filed under seal.

As required by the Memorandum and Order Regarding Sealing Confidential Information, the unredacted versions of the documents referenced herein are provided as exhibits to this Motion and as to items which are only partially redacted, those portions of the above referenced materials which were filed in redacted form pending a ruling on this Motion are highlighted.

Respectfully submitted this 22nd day of July, 2022.

/s/ Cheryl G. Rice	/s/	Cheryl G. Rice
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